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EPAExecSec <EPAExecSec@epa.gov>
FW: SIX failures at Weymouth, MA compressor — PHMSA, come back, a letter sent to Secretary Buttigieg
To: "CMS.OEX" <cms.oex@epa.gov>

From: Melissa Ludtke <melissa.ludtke@gmail.com>
Sent: Thursday, June 17, 2021 11:16 AM
To: DOTExecSec@dot.gov; Regan, Michael <Regan.Michael@epa.gov>; Tristan.brown@dot.gov; william.schoonover@dot.gov; Richard.glick@ferc.gov
Subject: SIX failures at Weymouth, MA compressor — PHMSA, come back, a letter sent to Secretary Buttigieg

As a resident of Eastern Massachusetts, who lives near Weymouth, MA, I am writing to echo the call to action in the June 14, 2021 letter that Fore River Residents Against the Compressor Station emailed to Secretary Buttigieg (letter is attached) asking him to have the Pipeline and Hazardous Materials Safety Administration (PHMSA) come back to Weymouth to investigate numerous safety issues that have arisen with the Enbridge gas transmission compressor station in Weymouth, MA.

The health of many families living close by this compressor station are threatened by this polluting facility on a daily basis. However, families' immediate safety is what I'm most concerned with since SIX outages have occurred there since September 2020. Of those six outages, only the first two were investigated, and only one of the first two outages was assigned a root cause.

Why was the station allowed to operate when the second investigation showed NO root cause?

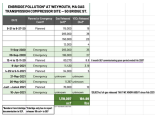
The remaining four outages were not investigated, which is unacceptable. PHMSA has the responsibility, ample cause, and the obligation to investigate. The safety of this community depends on using the authority of PHMSA to investigate the causes of the repeated station failures.

Nearby residents asked Secretary Buttigieg to visit Weymouth so he could see the close proximity this compressor station has to an environmental justice community, as well as to nearby critical infrastructure, which are also endangered by this station. This includes the Fore River Bridge, 300 feet away from the compressor, which has 33,000 cars traveling over it each day.



It is well known that compressor startups and shutdowns are the most polluting processes that a site such as this undergoes. Yet, in the short time this compressor station has been in operation, Weymouth has experienced six shutdowns and six startups, plus its initial commissioning.

Please look at this chart, below, for reported methane & VOC release totals since the first emergency system failure.



Governor Charlie Baker, who hasn't shown concern about human and infrastructure safety issues, also has not demanded action from

PHMSA, the EPA , or even his own relevant state agencies, as these community members are doing. They are asking Secretary Buttigieg to send PHMSA back, as well as to nudge the EPA on their behalf.

Clearly, these residents believe they are in trouble, and I am writing to say that I, too, believe that thorough investigations are necessary, and actions to protect the safety of Weymouth residents should be taken.

Thanks for your kind attention in hearing my concerns,

Melissa Ludtke

Eastern Massachusetts resident



June 14, 2021

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: The Enbridge (dba Algonquin Gas Transmission) Weymouth, MA Compressor Station

Dear Secretary Buttigieg,

The Fore River Residents Against the Compressor Station (FRRACS) congratulate you on your appointment by President Biden to this most important secretariat. Knowing that you are a person who understands the importance of government protections for the citizens of this country gives us hope that you might hear our story and become involved where others have not.

As the Executive in charge of the Pipeline and Hazardous Materials Safety Administration, we appeal to you to review the operations of the Enbridge (Algonquin) Weymouth compressor station. Our history of fighting this facility is six and a half years long, and we have no intention of discontinuing this battle for the health, safety, and environment of the Fore River Basin communities of Weymouth, Quincy, and Braintree.

While the health of our communities is threatened by this facility on a daily basis, it is our safety that we are most concerned with at this time and it is our safety that we are asking you to consider in allowing the continued operation of this station. We will try to be brief in giving you this quick history of the station, but will focus on the current safety issues for redress.

A brief history:

- Spectra Energy Texas pre-filed for the Atlantic Bridge project, of which the Weymouth station is a part, in 2014. Spectra was purchased by Enbridge CA in 2018. Algonquin is a subsidiary of Enbridge.
- FRRACS was established in 2015 to fight the siting of this station in an urban location that abuts two Environmental Justice neighborhoods in Quincy, in a FEMA flood zone, in an overburdened Basin containing eight polluting facilities, in an area that cannot be evacuated in case of an emergency, on a peninsula composed almost entirely of toxic industrial waste such as coal ash, coal clinkers, asbestos brick, and an underlying base of leaked petroleum. The site also hosts a conservation easement that was part of the mitigation for the Sithe (Calpine) Electric Power Plant that is located directly across Route 3A from the compressor station (see attached map). This easement is a public park.
- The placement of this facility in an Environmental Justice neighborhood violates Title VI of the Civil Rights Act of 1964.

- The Federal Regulatory Energy Commission (FERC) granted Enbridge the certificate of convenience in January of 2017.
- FRRACS was able to postpone the construction of the compressor until December of 2019, at which time FERC granted the notice to construct.
- FERC granted the certificate of operation in September of 2020.
- For a complete history of the project and our legal and political fight against the compressor please go to <https://www.nocompressor.com/>.

In September of 2020, during the commissioning period of the compressor and prior to it coming online, Enbridge experienced two emergency releases and shut downs on September 11 and on September 30. These two emergencies released 460K standard cubic feet (scf) of raw fracked methane into the communities. The second accident caused PHMSA to issue a Corrective Action Order¹ (CAO) and to temporarily halt the operations of the station until root cause analyses and a host of other actions and investigations were completed by Enbridge to the satisfaction of PHMSA. Two root cause analyses were completed by Enbridge in December of 2020 (see attached). We are unable to ascertain how many, if any, of the other demands made by the CAO have been completed.

On January 22, 2021, Enbridge requested that PHMSA lift the temporary operation constraints based on the delivery of the root cause analyses. PHMSA granted their request and, therefore, Enbridge was able to adhere to the requirements of the extended FERC certificate that the compressor be constructed ***and*** operational by January 25, 2021 or face the removal of the certificate of convenience.

During the temporary stoppage, Enbridge notified its customers that the Weymouth compressor station was under Force Majeure and deliveries would be constrained. Since the granting of the temporary permit to operate, Enbridge has experienced three more accidents of unknown origin on April 6, May 20, and May 26, 2021. (Please see attached chart.) Enbridge has placed Force Majeure on the compressor station for weeks on end since January 22, 2021.

As this station is adjacent to a public park and is less than 300 feet from the brand-new Fore River Bridge—a bridge funded by federal monies under the DOT—and is surrounded on three sides by navigable waters, Enbridge is in full public view when operational issues arise. Over the past week, we have seen a flurry of activities that have caused us great concern. One is the presence of Tetra Tech and of TRC, both companies that deal with environmental issues. Tetra Tech does oil spill investigations and clean-up, among other things. The station was placed over what we believe to be 11 million gallons of #2 diesel and #6 diesel leaked from a former tank that sat on the site from the 1980's through the mid-1990's or dumped there illegally from the former Fore River Shipyard. This petroleum, known as LNAPL—light non-aqueous phase liquid—is approximately 7 feet below the soil on the compressor property. The testing wells are currently being investigated.

¹ https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/2020-10/12020014CAO_Corrective%20Action%20Order_10012020-Algonquin%20Gas%20Transmission.pdf

Last Thursday, Enbridge abruptly issued an outage at the Weymouth Compressor station. (See attached forms.) Enbridge claimed to the local press that this was merely a maintenance activity to make adjustments to the control system,² but the critical notice posting and declaration of Force Majeure contradicts this statement (see attached). This unexplained outage brings the number of incidents (accidents) to six since last September.

We have watched a host of specialists come to the station. Caterpillar has been back to work on the new turbine. We have seen what we believe to be another turbine delivered to the station either as a replacement for the first one or as a backup turbine—either way without the required permits (see attached). We have seen Roto-Rooter on site several times over the past few months. Even more disturbingly, we have witnessed a shredding company remove documents from the station on a weekly basis. As this is a federally regulated utility, it surprises us that documents would be shredded. None of this lends to the appearance that this facility is safe in any way.

In February, FERC took the unprecedented action to reconsider the operation of this station by requesting a briefing on several issues. You may view this call for briefing by going to <https://ferc.gov/> and entering CP16-9-012 into the elibrary. FERC is looking at procedural failures that may have caused them to approve this station when it should not have done so.

Like FERC, PHMSA has a responsibility to investigate this station on the basis of safety. PHMSA has the right and the obligation to insure the safe operation of this facility.

Mr. Secretary, we are asking you to bring PHMSA back to Weymouth to do a full investigation of what exactly is wrong with this station. Were there to be any kind of incendiary accident, there is no way to safely evacuate the over 900 residences within the (half mile) notification zone, the 13 schools within a three mile radius (2 of those schools within .9 of a mile and one of those housing the South Shore's most medically vulnerable students), the federal elderly low income housing within the notification zone, the homeless veterans resident within the notification zone, the mental health center within the notification zone, and the many businesses within the notification zone. This does not include the thousands of commuters who traverse the Fore River Bridge on a daily basis (33,000/day).

The safety, and perhaps the very lives of our residents are dependent on you to use the authority of PHMSA to investigate and to stop the operation of this station before it is too late. When an accident finally takes out life and property, thoughts and prayers will fall on our deaf ears.

We invite you to visit with us in Weymouth at your convenience. We will be happy to supply information, tours, and coffee.

Respectfully,
Alice P. Arena
President, FRRACS

² <https://twitter.com/MiriamWasser/status/1403108465250344966?s=20>